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DEPT. OF TRANSPORTATION
DOCKETS

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June 16, 2006:

Docket Management Facility
U.S. Department of Transportation
400 Seventh Street, S.W., Room PL-401
Washington, DC 20590-0001

RE: TSA Docket Number TSA-2006-24191 - 155
Coast Guard Docket Number USCG-2006-24196 - 166

To Whom It May Concern:

I am a license pilot and an employee for Campbell Transportation Inc., which operates on the Inland Rivers, and I'm concerned that the TWIC implementation you are proposing will create an unjust burden on mariners and industry to comply. The burden I allude to is funding this program and implementing it in the face of rising fuel costs, fuel user fees, retrofitting our fleet to comply with an avalanche of new rules and regulations. The marine industry can't support the cost of these and other proposed legislations and maintain our reputation of being the most economical way to move products period.

I realize the importance of protecting our transportation industry but these new proposals are potentially as damaging as a terrorist attack to the marine industry. First off the marine industry and its employee's have been forced to adapt to an unprecedented number of new regulations. The industry and its resources are stretched to the limit trying to be compliant. We need only to look at the number of company's going out of business or consolidating due to increased legislation affecting their ability to be competitive in attracting license professional mariners from a rapidly decreasing pool. Mariners are exiting the industry at about a three to one ratio (3 OUT 1 IN). I believe the TWIC proposal as it stands will only compound this problem.

These proposed rulemakings are both large and complex. Therefore, I request that a 90-day extension of the comment period for these proposed rulemakings to allow concerned mariners and companies to focus on perceived problems so that these problems may be brought into the docket for further examination and review.

Thank you for an opportunity to make my comments.

Respectfully Submitted,

Raymond Earl Arche